

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, DANA McCORMICK,
et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, BARRY WEBER,
DENNIS McBRIDE, et al.,

Defendants.

**DEFENDANTS' MOTION TO QUASH PLAINTIFFS' NOTICE OF DEPOSITION
SERVED ON GEORGE SCHIMMEL AND FOR A PROTECTIVE ORDER**

Defendants, City of Wauwatosa, Barry Weber, Dennis McBride, Dominick Ratkowski, George Schimmel, Luke Vetter, Jeffrey Farina, Joseph Roy, Joseph Lewandowski, Martin Keck, Shane Wrucke, and Kathy Causier, by their attorneys, Gunta Law Offices, S.C., move the Court to quash Plaintiffs' notice of deposition served on George Schimmel and for a protective order pursuant to Fed. R. Civ. P. 26(c)(3), 37(a)(5) and 45. Prior to filing this Motion, the parties met and conferred in good faith in an effort to resolve this discovery dispute.

The grounds for this Motion are more fully set forth in the accompanying Brief in Support of Defendants' Motion and the Declarations of George Schimmel and Kyle R. Moore, which are incorporated by reference as if fully set forth herein. Defendants also seek costs associated with this motion.

Dated at Wauwatosa, Wisconsin this 30th day of September, 2021.

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